



THE EDWIN F. MANDEL LEGAL AID CLINIC
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July 29, 2005

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(1923-2004)

VIA FACSIMILE (312.744.6912)
CONFIRMATION COPY BY MAIL

Mr. Arnold H. Park
City of Chicago, Dept. of Law
30 N. LaSalle Street, Ste. 900
Chicago, IL 60602

Re: *Bond v. Utreras et al*, No. 04 C 2617

Dear Mr. Park:

On June 17, 2005, we wrote to you regarding the City's continued failure to respond to certain interrogatories and document requests. An additional copy of this letter is enclosed for your reference. *As you know, these discovery requests have been outstanding since October 2004.*

Because our office has received nothing in writing in response to this letter, I am concerned that we may need to file a Motion to Compel related to these requests. Please call me so that we can discuss whether such a motion will be necessary.

Thank you in advance for your prompt attention to this matter.

Very truly yours,

H. Melissa Mather

Encl.: Copy of letter from D. Pugh to A. Park, dated June 17, 2005

*Licensed in Texas & New York, not licensed in Illinois



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June 17, 2005

Arnold H. Park
City of Chicago, Dept. of Law
30 N. LaSalle Street, Ste. 900
Chicago, IL 60602

Re: Bond v. Utreras et al., No. 04 C 2617

Dear Mr. Park,

In light of Judge Lefkow's recent opinion upholding Ms. Bond's right to prosecute her *Monell* and supervisory claims, it is clear that Ms. Bond is entitled to certain answers to interrogatories and to documents that were requested in Plaintiff's First Set of Interrogatories and Document Requests on October 8, 2004.

Specifically, at this time we demand that you provide a complete response to the following:

From Plaintiff's First Set of Interrogatories:

- Interrogatories 8 and 10
- Interrogatories 13 through 17

From Plaintiff's First Request to Produce Documents:

- Requests 9 through 17
- Request 18 (at this time, however, we demand only the documents from 2003 and 2004)
- Requests 20 through 27
- Requests 29 through 34
- Request 53
- Request 61(A-C), 61(G-Q)
- Request 62(A-C), 62(G-Q)
- Requests 69 through 72

Additionally, it appears that we still are missing the identification information sought in Document Requests 42(G-H), 48(G-H), and 51 (A-C, E). We have repeatedly stressed the need for this information in other letters, as it goes directly to the individual police defendants' claim that Ms. Bond has mis-identified them. Similarly, given the defendants' alibi defense, please produce any additional daily activity reports or supervisor management logs of the individual police defendants and their immediate supervisors for April 13, 28, and 30, 2003, and March 29 and 30, 2004, as called for in Document Request 45. If no additional documents exist, please confirm that this is so writing.

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Please supply the City's supplemental answers and documents within three weeks. If you have any objections please call me as soon as possible at (773) 702-9611 so that we can confer, pursuant to Rule 37, to see if court action will be necessary.

Sincerely,

/s/ Deborah Pugh

Deborah Pugh
Law Graduate